

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ADAM GRAY)	
)	
Plaintiff,)	Case No. 18 CV 2624
v.)	
)	
CITY OF CHICAGO, Special Representative)	
of the Estate of NICHOLAS C. CRESCENZO,)	
JR., Special Representative of the Estate of)	
GEORGE JENKINS, Special Representative)	Judge John Z. Lee
of the Estate of MICHAEL A. POCHORDO,)	
Special Representative of the Estate of CRAIG)	Magistrate Judge Beth W. Jantz
CEGIELSKI, ERNEST R. ROKOSIK,)	
Executor of the Estate of ERNEST W.)	
ROKOSIK, DANIEL MCINERNEY, PERCY)	
DAVIS, ROBERT FITZPATRICK, L.)	
MARTINEZ, JOSEPH GRUSZKA, JAMES)	
R. BROWN, COOK COUNTY, and AS-YET)	
UNKNOWN CHICAGO POLICE)	
DETECTIVES,)	
)	
Defendants.)	

**JOINT STATUS REPORT SUBMITTED PURSUANT TO
THIS COURT'S JUNE 2, 2020 ORDER**

1. Progress of Discovery

Fact discovery closed on January 31, 2020 but the court granted the parties leave to take the following witnesses' deposition outside the close of fact discovery: Marty Beyer, Roger Shuy, Fabio Valentini, and Brenda Thomas. (See 3/4/20, Doc. # 202, #214).

As reported in the May 13, 2020 status report, the deposition of Marty Beyer was completed and the parties reached an agreement that obviates the need to take the deposition of Roger Shuy. The parties are still seeking to take the depositions of Fabio Valentini and Brenda Thomas.

Attorneys for the Individual City Defendants are working with Mr. Valentini's counsel to coordinate a deposition date for Mr. Valentini in September or October; this deposition has been delayed due to the public health emergency. Brenda Thomas is believed to live in Minnesota. The parties will continue efforts to serve and depose Ms. Thomas when it is safe for the parties to travel.

2. Status of Briefing on Unresolved Motions

Not applicable.

3. Proposed Schedule for Cases Without Any Future Court Dates

Not applicable.

4. The Current Court Dates Do Not Require Revision

On May 19, 2020, the court entered the following expert discovery schedule: “The Court has reviewed the parties' status report. Parties shall simultaneously disclose expert reports by 9/4/20 and disclose rebuttal reports by 11/19/20. All expert discovery must be completed by 1/5/21.” (Doc. #215). The parties agree that these dates do not require revision at this time.

5. Any Agreed Action that the Court Can Take Without a Hearing

Not applicable.

6. Need for a Telephonic Hearing or In-Person Hearing

Not applicable.

DATED: July 29, 2020

Respectfully submitted,

Attorneys for the Plaintiff

/s/ Cindy Tsai

Jon Loevy

Tara Thompson

Cindy Tsai

Loevy & Loevy

311 N. Aberdeen St., 3rd Floor

Chicago, Illinois 60607

Elizabeth Wang

Loevy & Loevy

2060 Broadway, Ste. 460

Boulder, CO 80302

Attorneys for Defendant City of Chicago

/s/ Elizabeth A. Ekl

Terrence Burns

Elizabeth A. Ekl

Paul Michalik

Daniel Noland

Katherine C. Morrison

Daniel J. Burns

Dhaviella N. Harris

Reiter Burns LLP

311 S. Wacker Dr., Suite 5200

Chicago, IL 60606

**Attorneys for Defendants Cook County
and James R. Brown**

/s/ Winnefred A. Monu

Kenneth M. Battle

Jessica Gomez-Feie

Winnefred A. Monu

O'Connor & Battle LLP

20 N. Clark St., Suite 1600

Chicago, IL 60602

Attorneys for Individual City Defendants

/s/ Helen O'Shaughnessy

Shneur Nathan

Avi Kamionski

Helen O'Shaughnessy

Nathan & Kamionski LLP

33 W. Monroe St., Suite 1830

Chicago, IL 60603

CERTIFICATE OF SERVICE

I, Helen O'Shaughnessy, an attorney, certify that I served the foregoing Status Report on all counsel of record via CM/ECF on July 29, 2020.

/s/ Helen O'Shaughnessy